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October 10, 2001

The Honorable Catherine C. Blake
United States District Court
for the District of Maryland
101 West Lombard Street, Room 110
Baltimore, MD 21201

RECEIVED IN THE OFFICE OF
CLERK OF DISTRICT COURT
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BALTIMORE, MD
UNITED STATES DISTRICT JUDGE

**Re: Sovereign Bank v. Bankers First Mortgage Company, et al.
National Mortgage Warehouse LLC v. Bankers First Mortgage
Company, Inc. et al.
No.: CCB00CV2881**

Dear Judge Blake:

This firm represents Plaintiff, Sovereign Bank, in connection with the above matter. The purpose of this letter is to request additional time for Sovereign to file a dispositive motion in connection with this case.

This Court, on February 12, 2001, approved a letter sent by Mr. Ohly which had set forth the agreed upon dates and deadlines in this case. The deadline for filing dispositive motions was set for October 1, 2001. However, this Court, in September, 2001, agreed to extend the time for National Mortgage Warehouse to take additional depositions of Joyce Trikeriotis and John Trikeriotis. The deposition of Joyce Trikeriotis was concluded earlier this month, and the John Trikeriotis deposition is scheduled to begin today.

Sovereign Bank intends to file a motion for summary judgment, which will be very similar in form and substance to the Motion for Summary Judgment filed by National Mortgage Warehouse some months ago. However, because discovery has not yet been completed, it was our opinion that such a motion could be premature. Additionally, Christopher Trikeriotis has recently plead guilty to bank fraud, but the factual statement was not available in time to meet the October 1, 2001 deadline. This fact is certainly important for such a motion. Accordingly, we request to have until November 1, 2001 for Sovereign to file any dispositive motions. We do not believe that

✓
Approved
CCB/Blake
cc: DJ
10/17/01

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any conceivable prejudice will result from this extension of thirty days, especially given the additional discovery that was granted. Finally, Sovereign would not have any objections to this deadline being extended for all parties.

Your time and consideration of this matter is appreciated.

Respectfully,

A handwritten signature in black ink, appearing to be "JMR", written over a circular line.

Jason M. Reiser

JMR/pb

cc: All Counsel